



Marty Hornick
351 Pacu Ln, Suite 200
Bishop, CA 93514
mhornick@fs.fed.us

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Re: North Zone Motorized Transportation System Modifications

Friends of the Inyo (FOI) appreciates the opportunity to comment on the proposed action as described in the public scoping notice for the North Zone “Motorized Transportation System Modifications” project.

Below, following the order in the Proposed Action description, we address each of the routes described in the project description:

Bohler Canyon

In 2005 FOI recommended closing this route and restoring it to its natural condition given the riparian corridor, creek and meadow crossings. The area is much drier than it was in 2005, and is usually dry by 1 August. If it is not economically feasible to close this route altogether due to trespass issues, we support the limited seasonal use of Aug 1-October 31. Seasonal use will require increased USFS management and monitoring of mitigation measures will need to occur regularly with adaptive management approach. This monitoring should be specifically included as an “action” in the proposal and include a specific trigger for closure of the route if riparian and meadow damage is occurring. If the proposed modification is completed, we recommend the Forest install large and clear signage on the lower LADWP portion of this route alerting members of the public as to the seasonal nature of this route. This route is narrow and hemmed in with tight aspen trees; turning around will be difficult in closed seasons and should be clearly communicated via signage. Signage should also be posted at the beginning of the route indicating the difficulty and narrowness of the route.

Rush Creek Delta

Of the two routes paralleling the lower section of Rush Creek, we recommend the west-side route be re-opened, as it is farther from the creekbank and does not provide motorized access to the delta itself. Motorized access to the edge of the delta should be prohibited to decrease disturbance to birds and resource conditions. We oppose the proposal to expend limited resources to “harden” this sandy route. The process of hardening will not protect any known resources and will create an artificially high level of use. This route should be left as a native surface, with adequate signage indicating the sandy substrate, 4WD only nature of this route. This route should be managed using an adaptive approach with regular, prescribed monitoring. As with Bohler, this monitoring should be specifically included as an “action” in the proposal and include a specific trigger for re-closure of the route if motorized use is expanded beyond the legal route.



Alternatively, we would support a partial closure of this route to the large turn around parking area. From here, a walking trail could be designated to the delta overlook.

Airstrip Sand Flat

We support the creation of a new route connecting 02S03 and 02S114 to address safety concerns. To address the ongoing off-route proliferation in this fragile dry-forb meadow, this proposal should also designate the southern portion of 02S114 as a “one-way route” from the junction of the newly proposed route south to the junction with 2S03. This portion of 02S114 should be designated for one-way traffic in the south-bound, downhill direction only. Not only is this north-bound, uphill traffic dangerous, but north-bound traffic on the southern portion of 02S114 is creating a high level of off-route travel into the sand gully west of the hill climb. It should be noted that 02S121 which is proposed for “administrative use only” is already gated and closed to the public. This should be corrected in the draft environmental assessment. The removal of the north section of 2S121A should also include decommissioning and restoration with native materials north of the sheep bedding grounds to deter unauthorized use.

Deadman Creek Camping

While the proposed action states that “dispersed camping opportunities along the upper Deadman Creek Road (2S05) are presently somewhat limited”, a field review conducted on 10 November 2014 found ten dispersed campsites (defined by road accessible areas with fire rings and signs of camping) along the 2.5 mile stretch of 2S05 along Deadman Creek from Upper Deadman Creek Campground (11 sites) to road’s end. This above inventory did not count the nearly dozen dispersed sites that have become well established along 02S05L north of Upper Deadman and 03S105 in the immediate area of Lower Deadman Campground (22 sites). With nearly four dispersed campsites per mile along 2S05 upstream from Upper Deadman Campground, the supposed need for additional dispersed sites along this short corridor is unfounded. We strongly oppose adding yet another route to a Wild & Scenic River Corridor. The proposed route to be added is completely restored with two large logs, a roadside berm and logs and native mulch covering its entire length. Route U-03S126 is very narrow as it winds through dense lodgepole forest, and accesses only one identifiable campsite, accessible only to smaller trucks and vehicles. We strongly urge the Forest to refrain from any additional facilities modifications within the Deadman Creek Wild & Scenic River Corridor until the completion of the congressionally mandated and overdue Wild & Scenic River Corridor Management Plan.

Geothermal Plant to Lookout Loop Connector Trail

FOI appreciates the Forest addressing public desire for more motorized single-track opportunities on forest lands, however we are concerned that this route will require significant investment to create a legally compliant and sustainable motorized trail. Most of this route is currently a series of multiple crisscrossing motorcycle tracks, not a defined trail. Many sections exceed Forest and State grade requirements as evidenced by deep erosion ruts and, more often, a complete lack of defined trail tread. Most of this trail has been repeatedly restored by Forest staff, American Conservation Experience and



Friends of the Inyo crews. Undoing this restoration work, as well as undertaking the planning and subsequent construction will be time and resource intensive. If the Forest chooses to add this route, it must ensure this route meets Forest and state standards under state funding requirements. The public should be aware of the requirements and the requisite time and cost involved with bringing this route up to legal standard.

Long Valley South and Laurel Ponds Moraine

We recommend these routes stay closed to public use, while continuing to allow USGS to access the route via a Special Use Permit. The proposal appears to be based upon the Forest's assumption that "administrative use only" routes have the same impacts as those that are open to the public. This logic ignores traffic volumes, vehicle types, erosion, wildlife disturbance, associated recreational uses (camping, fires, etc.) and off-route proliferation. The environmental effects of a road open for public use and a route used a few times a year by a known, permitted entity are not the same. This justification should be removed from this and all other proposals in this project.

Smokey Bear Flat

Smokey Bear Flat is an area of constant proliferation issues in listed species habitat. Adding this route will exacerbate these issues. Sheep permittee activities in this area should be dealt with in the same manner as the routes proposed for sheep permittee access in Airstrip Sand Flat – designate the requested routes for administrative use only and block them to public use through the use of a removable barrier.

We look forward to reviewing the Draft Environmental Assessment for this project in 2015. Thank you for your thoughtful consideration of our comments on the transportation system modifications, and thank you to the rest of the Inyo National Forest staff for working to enhance public use and enjoyment of the public's Forest lands.

Sincerely,

Jora Fogg
Preservation Coordinator
Friends of the Inyo
jora@friendsoftheinyo.org